# Preliminary feedback and questions on 2020 Texas Regional Haze Source Selection Procedures for 4-factor Analysis

Following the Texas Division of Air Quality presentation to the Federal Land Managers on 3/31/2020 the National Park Service Air Resources Division has updated the list of sources (see below) that we recommend for 4-factor analysis as part of Regional Haze SIP development. This update reflects the best available information that we can readily access and our understanding of the Texas process. We look forward to discussing the list with you. We have several questions about the Texas source selection process that we have set forth below. In advance, we look forward to continuing to work with you and your staff on this program which is so important for remedying and preventing the occurrence of regional haze in our national parks and wilderness areas.

## In summary:

We are pleased that Texas has selected an individual pollutant-based Q/d threshold of 5 as screening criteria for 4-factor analysis consideration. This approach brings in a wider swath of appropriate sources for consideration than a combined pollutant approach.

Sources selected by Texas for consideration include 3 of our top 5 sources but only 11 of the top 26 that we believe meet the basic Texas screening criteria. We look forward to learning why each of the 15 sources that we believe meet the Texas criteria are not included. Likely, aspects of the 2028 emission projections and area of influence analysis used by Texas explain some or all of these omissions.

Finally, we encourage you to consider expanding the Texas engine rule requirements in place for ozone non-attainment areas to the Permian basin. This could be an effective method of addressing oil and gas area source emissions that are impairing visibility at Carlsbad Caverns and Guadalupe Mountains National Parks.

## Source selection presentation questions/comments:

- (Slide 7) Why weren't Bandelier National Monument and Carlsbad Caverns National Park included here?
- (Slide 39) We understand that emissions used should be 2017 or later based on EPA guidance.
- (Slide 41) Were Bandelier National Monument and Carlsbad Caverns National Park included here? If not, why not? Were Great Sand Dunes and Rocky Mountain National Parks in Colorado included (they are on Slide 7)? Would you provide us the analysis showing which facilities were accepted and which were rejected for further consideration?
- (Slides 42 & 43) Why are only 3 Class I areas (CACR, GUMO, WIMO) considered for the $SO_2$ area of influence analysis and only 4 Class I areas (CACR, GUMO, SACR, and WIMO) considered for the $NO_X$ area of influence analysis? Why were Bandelier National Monument, Big Bend National Park, and Carlsbad Caverns National Park not included? We believe they should have been included and that SACR should have been included for both pollutants.

Thank you.

## Updated NPS List of Texas Facilities Recommended for Regional Haze 4-Factor Analysis
(See Table Notes Below)

| | Facility Name | EIS ID/ORISPL | Inventory | NOₓ | NOₓ Q/d | SO₂ | SO₂ Q/d | Total Q | Distance to NPS Class I Area | Total Q/d | NPS Class I Area |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | Sam Seymour | 6179 | CAMD (2019) | 6,211 | 135.6 | 930 | 20.3 | 7,141 | 46 | 155.9 | BIBE |
| 2 | San Miguel | 6183 | CAMD (2019) | 2,267 | 17.0 | 8,940 | 67.1 | 11,207 | 133 | 84.2 | GUMO |
| 3 | Guadalupe Compressor Station | 6388711 | NEI 2017 | 468 | 75.8 | 0 | 0.0 | 468 | 6 | 75.8 | GUMO |
| 4 | Martin Lake | 6146 | CAMD (2019) | 9,489 | 11.0 | 46,549 | 53.9 | 56,038 | 863 | 64.9 | BIBE |
| 5 | Calaveras Plant | 5617211 | NEI 2017 | 5,185 | 11.7 | 12,098 | 27.3 | 17,282 | 443 | 39.0 | BIBE |
| 6 | W A Parish | 3470 | CAMD (2019) | 4,589 | 5.3 | 28,811 | 33.4 | 33,400 | 863 | 38.7 | CAVE |
| 7 | Welsh Power Plant | 6139 | CAMD (2019) | 4,951 | 11.4 | 11,178 | 25.8 | 16,129 | 433 | 37.3 | CAVE |
| 8 | Big Spring Carbon Black Plant | 5649411 | NEI 2017 | 599 | 2.1 | 5,328 | 19.1 | 5,927 | 280 | 21.2 | CAVE |
| 9 | Harrington Station | 6193 | CAMD (2019) | 2,945 | 4.5 | 10,476 | 16.1 | 13,421 | 652 | 20.6 | BAND |
| 10 | Limestone | 298 | CAMD (2019) | 7,470 | 11.5 | 5,685 | 8.7 | 13,156 | 652 | 20.2 | BAND |
| 11 | Borger Carbon Black Plant | 4863711 | NEI 2017 | 840 | 1.9 | 6,950 | 15.9 | 7,789 | 436 | 17.9 | BAND |
| 12 | Oxbow Calcining | 5651211 | NEI 2017 | 609 | 0.7 | 11,495 | 13.3 | 12,104 | 866 | 14.0 | BIBE |
| 13 | Fayette Power Project | 4144811 | NEI 2017 | 7,130 | 11.9 | 1,130 | 1.9 | 8,260 | 598 | 13.8 | BIBE |
| 14 | Oak Grove | 6180 | CAMD (2019) | 4,535 | 5.3 | 6,974 | 8.1 | 11,510 | 863 | 13.3 | CAVE |
| 15 | Keystone Gas Plant | 4035711 | NEI 2017 | 1,130 | 8.8 | 435 | 3.4 | 1,565 | 129 | 12.2 | CAVE |
| 16 | Tolk Station | 6194 | CAMD (2019) | 2,488 | 2.8 | 7,225 | 8.3 | 9,713 | 876 | 11.1 | CAVE |
| 17 | Goldsmith Gas Plant | 6507511 | NEI 2017 | 750 | 4.5 | 990 | 6.0 | 1,740 | 166 | 10.5 | CAVE |
| 18 | Borger Carbon Black Plant | 5655811 | NEI 2017 | 485 | 1.1 | 3,706 | 8.5 | 4,191 | 436 | 9.6 | BAND |
| 19 | Cornudas Plant | 7910211 | NEI 2017 | 362 | 7.9 | 5 | 0.1 | 367 | 46 | 8.0 | GUMO |
| 20 | Block 31 Gas Plant | 4163111 | NEI 2017 | 1,270 | 6.4 | 3 | 0.0 | 1,273 | 199 | 6.4 | CAVE |
| 21 | Works No 4 | 5024111 | NEI 2017 | 3,575 | 5.3 | 526 | 0.8 | 4,101 | 670 | 6.1 | BIBE |
| 22 | Streetman Plant | 4946511 | NEI 2017 | 681 | 1.0 | 3,493 | 5.04 | 4,174 | 693 | 6.0 | BIBE |
| 23 | 1604 Plant | 5631811 | NEI 2017 | 2,500 | 5.7 | 3 | 0.0 | 2,503 | 439 | 5.7 | BIBE |
| 24 | Odessa Cement Plant | 4144411 | NEI 2017 | 938 | 5.2 | 19 | 0.1 | 957 | 180 | 5.3 | CAVE |
| 25 | Newman | 3456 | CAMD (2019) | 1,875 | 5.1 | 9 | 0.0 | 1,884 | 369 | 5.1 | CAVE |
| 26 | Andrews Booster | 4171311 | NEI 2017 | 843 | 5.05 | 0 | 0.0 | 843 | 167 | 5.1 | CAVE |

Table notes:

1. Facility names highlighted in green are on both the updated NPS list for consideration and the Texas list of sources presented on March 31, 2020.
2. NEI 2017 data presented were pulled in August of 2019.
3. Yellow highlighting indicates facility-based $NO_X$ or $SO_2$ Q/d values are greater than 5, the screening threshold presented by Texas to FLMs on March 30, 2020.
4. For this table "total" Q includes $NO_X$ + $SO_2$ and does not consider PM.
5. Distance to NPS Class I area is shown in kilometers.
6. NPS Class I areas presented are the most affected but not the only ones affected by an individual facility. Abbreviations are: BAND (Bandelier National Monument, New Mexico), BIBE (Big Bend National Park, Texas), GUMO (Guadalupe Mountains National Park, Texas), and CAVE (Carlsbad Caverns National Park, New Mexico).